
From: Ariel Reinitz
Sent: Friday, December 3, 2021 2:24 PM
To: Jacob Schindelheim; Shira Goldman Moyal
Cc: Simcha Schonfeld
Subject: RE: Notice of Deposition: GateGuard v. Goldmont, et al. - SDNY 1:20-cv-01609-AJN

That's what I was trying to do.

Please produce the email(s) Mr. Goldenberg referenced during yesterday's deposition, specifically any email Mr. Goldenberg received around August 30, 2019 containing scanned pages of the parties' agreement.

Alternatively, please advise as to your availability to meet and confer re: our anticipated motion to compel production of these documents.

Thanks,
Ariel

Ariel Reinitz
Partner

FisherBroyles, LLP
direct: +1.646.494.6909
ariel.reinitz@fisherbroyles.com
www.fisherbroyles.com

The information contained in this e-mail message is only for the personal and confidential use of the intended recipient(s). If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

From: Jacob Schindelheim <jjs@kandsllp.com>
Sent: Friday, December 3, 2021 2:09 PM
To: Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>; Shira Goldman Moyal <shira@kandsllp.com>
Cc: Simcha Schonfeld <sds@kandsllp.com>
Subject: RE: Notice of Deposition: GateGuard v. Goldmont, et al. - SDNY 1:20-cv-01609-AJN

Ariel,

As stated during the deposition, please send your formal discovery demands in writing and we will respond accordingly.

Best,

Jake

From: Ariel Reinitz <Ariel.Reinitz@fisherbroyles.com>
Sent: Friday, December 3, 2021 12:29 PM
To: Shira Goldman Moyal <shira@kandsllp.com>
Cc: Jacob Schindelheim <jjs@kandsllp.com>; Simcha Schonfeld <sds@kandsllp.com>
Subject: RE: Notice of Deposition: GateGuard v. Goldmont, et al. - SDNY 1:20-cv-01609-AJN

Counsel – while we await the transcript of yesterday’s deposition, I am following up in writing (per your request) re: documents Abi Goldenberg referenced in his testimony that were not produced.

Specifically, I believe Mr. Goldenberg testified that around August 30, 2019 he used a scanner to scan pages from the parties’ agreement, and the scanner generated a PDF sent to Mr. Goldenberg via email.

Can you please produce these email(s) and any attached document(s)? Alternatively, please advise as to your availability to meet and confer re: our anticipated motion to compel their production.

Thanks,
Ariel

Ariel Reinitz
Partner

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From: Ariel Reinitz
Sent: Wednesday, December 1, 2021 5:10 PM
To: Shira Goldman Moyal <shira@kandsllp.com>
Cc: Jacob Schindelheim <jjs@kandsllp.com>; Simcha Schonfeld <sds@kandsllp.com>
Subject: RE: Notice of Deposition: GateGuard v. Goldmont, et al. - SDNY 1:20-cv-01609-AJN

Counsel – the link for Goldmont’s 30(b)(6) deposition (beginning tomorrow, Dec. 2, 2021 at 9:00am) is below.

<https://proceedings.veritext.com/?token=d7095838d01149164da6da396058d66b>

If Goldmont’s designee will not have access to a computer with a webcam and a reliable internet connection sufficient to conduct a Zoom video call, please let me know immediately.

Thanks,
Ariel

Ariel Reinitz
Partner

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